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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

**DEFENDANT'S EMERGENCY MOTION FOR ORDER EXTENDING THE TIME
FOR FILING DISPOSITIVE MOTIONS**

Defendant CLARK COUNTY by and through its counsel of record, PITEGOFF LAW OFFICE and JEFFREY I. PITEGOFF, hereby moves this Court, for an Emergency Order Extending the time for the filing of dispositive motions from July 14 until July 29, or in the alternative, to at least July 19, 2010. The undersigned counsel understands that Plaintiff does not object to the two-week extension, but the signed stipulation has not as yet been received from Plaintiff's counsel. Counsel have communicated in regard to this request. It is the undersigned's understanding that counsel for Plaintiff is out of Town for the next three days.

As referenced in the parties' stipulation filed in May (#106), at that time there had been over 7000 pages of documents produced and 30 depositions. Since then, the deposition of

1 Plaintiff's proposed expert, S. Tanner, was completed although the transcript was not available
2 until early June. As well, efforts were made to resolve the disputes concerning document
3 productions also referenced in that stipulation. Additional documents were produced in late
4 June to resolve discovery disputes. Also, the parties met and conferred in an effort to clear up
5 problems with discovery production as many of the production disclosures had duplicative
6 Bates Numbers and overlapping numbers. This caused the parties a problem in trying to
7 reference documents. The parties fixed this problem with a significant effort to renumber
8 documents and make the numbers sequential.
9

10 Furthermore, Plaintiff has four federal law claims and four state law claims. Given the
11 massive amount of materials in this case, the number of legal issues, and the need to not only
12 review but to consider how to cull down to a reasonable presentation matters the Defendant
13 believes are indicative of the absence of genuine issues of material facts, the additional time
14 requested herein is necessary.
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16 For the above reasons, it is requested that the Court extend the time for the filing of
17 dispositive motions until July 29, or, in the alternative, to a date on or after July 19. This
18 request should not impact the trial setting in this matter.
19

20 Dated this 12th day of July, 2010.
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22 /s/Jeffrey Pitegoff
23 Jeffrey I. Pitegoff, Esq.
24 Attorney for Defendant
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ORDER

Defendant's Motion for an Order Extending the Time for Filing Dispositive Motions is hereby GRANTED. IT IS ORDERED that the motions are to be filed on or before July 29, 2010.

IT IS SO ORDERED

George Foley Jr.

GEORGE FOLEY, JR.
U.S. MAGISTRATE JUDGE
DATED: July 13, 2010